

Counsel at end of document

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING, an agency of the State of
California,

Plaintiff,

and,

STEVEN J. CARAUDDO,

Plaintiff-Intervenor,

vs.

LUCENT TECHNOLOGIES, INC., and; DOES
ONE through THIRTY, Inclusive,

Defendants.

) **Case No. C 07-3747 PJH**

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) **STIPULATION AND [PROPOSED]**

) **ORDER EXTENDING EXPERT**

) **DISCOVERY CUTOFF AS TO EXPERT**

) **MICHAEL ROBBINS**

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STIPULATION

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing
and plaintiff-intervenor Steven Carauddo, collectively referred to herein as "parties" jointly stipulate
as follows:



1 1. This Court's most recent order set forth the Non-expert and Expert Discovery Cutoff as
2 October 3, 2008.

3 2. While all other depositions will be completed by all parties on or before the current
4 Cutoff, the deposition of human resources expert Michael Robbins cannot practicably be completed
5 by that date given his need to review various fact witness depositions in order to update his Rule 26
6 report and be deposed. The parties agree that it would be beneficial to have a brief extension of the
7 above deadline as to this witness only.

8 3. Therefore, the parties request that this court set the following deadlines for the
9 supplemental report and deposition of Michael Robbins:

| 10 <u>Deadline</u> | <u>Proposed Extended Date</u> |
|---|-------------------------------|
| 11 Supplemental Rule 26 Report of Michael Robbins | October 21, 2008 |
| 12 Deposition of Michael Robbins | October 29, 2008 |

13 4. Defendant does not waive any objection to the content of any supplemental report by
14 this Stipulation.

15 **SO STIPULATED:**

16 Dated: September __, 2008

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING

TIMOTHY M. MUSCAT
Chief Counsel

SUSAN SAYLOR
Senior Staff Counsel

22 By: /s/ Susan Saylor

23 _____
Susan Saylor
Attorneys for plaintiff, DFEH



1 Dated: September 23, 2008

BOXER & GERSON, LLP

2
3
4 By: /s/ Jean K. Hyams

5 Jean K. Hyams
6 Counsel for Steven Carauddo

7 Dated: September 23, 2008

8 EPSTEIN BECKER & GREEN, P.C.
9 STEVEN R. BLACKBURN
10 LESLIE J. MANN

11 By: /s/ Leslie J. Mann

12 Leslie J. Mann
13 Attorney for defendant
14 LUCENT TECHNOLOGIES INC.

15 **ORDER**

16 The following deadlines are set for the supplemental report and deposition of Michael

17 Robbins:

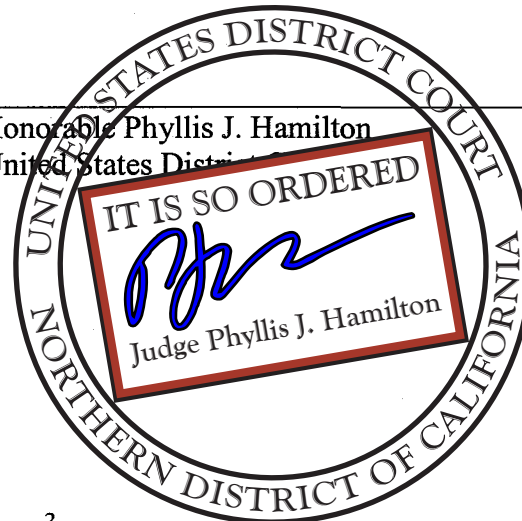
18 **Deadline**

19 Supplemental Rule 26 Report of Michael Robbins October 21, 2008

20 Deposition of Michael Robbins October 29, 2008

21 Dated: 9/24/08

22 Honorable Phyllis J. Hamilton
23 United States District Court



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